

**UNITED STATE BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

**IN RE
EVELYN PEREZ CORTES**

CASE NO. 10-12368-ESL

CHAPTER 13

DEBTOR(S)

OBJECTION TO CONFIRMATION

TO THE HONORABLE COURT:

Comes now, **RELIABLE FINANCIAL SERVICES, INC.**, holder of a secured claim and Movant herein, through the undersigned attorney very respectfully Alleges and Prays:

1. Movant is the holder in due course of a duly executed conditional sales contract over motor vehicle HONDA CR-V 2008 registered under number 3546712, executed by debtor(s) on JULY 16, 2008.

2. Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code on DECEMBER 31, 2010.

3. On today's date, Movant filed a Proof of Claim in the amount of \$26,476.95 as a secured claim with evidence of its security.

4. Debtor's proposed Chapter 13 plan dated on FEBRUARY 16, 2011 does not provide for adequate protection payments to this secured claim.

5. For all the aforementioned, debtor's Chapter 13 Plan should be amended to provide for adequate protection to this secured claim, in accordance with the requirements set forth in 11USC Section 361.

WHEREFORE, Movant prays this Honorable Court that debtor's Plan be denied confirmation at the hearing on confirmation and for such other relief as may appear appropriate to the Court.

CERTIFICATE OF SERVICE

I hereby certify that the present motion was filed electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the **JOSE R. CARRION**, Trustee and **JOSE M PRIETO CARBALLO**, Debtor(s) Attorney and that we have sent copy of this document through regular mail to Debtor(s) **EVELYN PEREZ CORTES,, URB RIVER GDNS 66 CALLE FLOR DEL RIO CANOVANAS, PR 00729.**

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 18 day of MARCH, 2011.

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